Michail Z. Hack, Esq.

SCHWARTZ LAW, P.C.

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Attorneys for Plaintiff Katherine Salisbury

UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

KATHERINE SALISBURY, Civil Action No.: 15-09799 (AJN)

Plaintiff,

against

THE PRUDENTIAL INSURANCE COMPANY OF AMERICA,

Defendant.	

DECLARATION OF MICHAIL Z. HACK

Michail Z. Hack, an attorney duly admitted to practice before this Court, hereby declares as follows pursuant to 28 U.S.C. § 1746:

- 1. I am a partner with the law firm Schwartz Law, P.C., counsel to the Plaintiff, Katherine Salisbury in the above-referenced action. I submit this declaration in support of Katherine Salisbury's Rule 72 Objections to Magistrate Judge Andrew J. Peck's April 7, 2017 Order.
- 2. Attached hereto and incorporated herein as Exhibit A is a true and correct copy of the Dr. Valenza's Independent Medical Evaluation dated January 28, 2015. It bears identifier PRU 077212-001078-002572.
- 3. Attached hereto and incorporated herein as Exhibit B is a true and correct copy of the Dr. Valenza's Addendum to Independent Medical Evaluation dated February 23, 2015. It bears identifier PRU 077212-001078-001584.

- 4. Attached hereto and incorporated herein as Exhibit C is a true and correct copy of the transcript of the discovery conference held before Judge Andre Peck on March 31, 2017.
- 5. Attached hereto and incorporated herein as Exhibit D is a true and correct copy of Plaintiff's April 4, 2017 letter to the Defendant containing additional questions. This document was filed as an attachment to the letter addressed to Judge Peck under ECF Docket Number 46.
- 6. Attached hereto and incorporated herein as Exhibit E is a true and correct copy of the Memo Endorsement by Judge Peck under Docket Number 47.
- 7. Attached hereto and incorporated herein as Exhibit F is a true and correct copy of Invoice #34152 from Ethos Risk Services. It bears identifier PRU 077212-001078-002015.

Dated: Garden City, New York April 14, 2017

Respectfully submitted, SCHWARTZ LAW, P.C.

By: <u>/s/Michail Z. Hack</u>
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Attorneys for Plaintiff Katherine Salisbury